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February 9, 2018

Via E-Filing

The Honorable Gerald J. Pappert
U.S. District Court for the
Eastern District of Pennsylvania
U.S. Courthouse
601 Market St., Room 5614
Philadelphia, PA 19106

RE: *Complete Business Solutions Group, Inc. V. Global Auto Restoration, LLC and Ray Sprouse*- Civil Action No. 17-cv-5779 (GJP)

Dear Judge Pappert:

This firm represents defendants Global Auto Restoration, LLC and Ray Sprouse (collectively “Global Auto”) in the above-captioned matter. This letter is intended to briefly respond to the letter submitted by Complete Business Solutions Group’s (“CBSG”) on February 7, 2018.

Global Auto disagrees with CBSG’s characterization of this action. First, CBSG is incorrect in asserting that the amount in controversy is less than \$75,000. As stated in Global Auto’s removal papers, once the judgment is opened, Global Auto will assert counterclaims against CBSG (including, but not limited to, claims for violating the Federal Racketeer Influenced and Corrupt Organizations Act and Georgia’s Uniform Deceptive Trade Practices Act) alleging damages in excess of \$75,000. Second, as a direct result of CBSG’s attempts to collect upon an unlawful debt, Global Auto lost its franchise license and was forced out of business. Accordingly, Global Auto will be seeking the lost value of its business among its damages, which will exceed \$75,000 but not likely exceed \$150,000. Either way, this court has subject matter jurisdiction because this action involves a federal question. *See Gregoria v. Total Asset Recovery, Inc.*, Civ. A. No. 12-4315, 2015 U.S. Dist. LEXIS 1818 (E.D. Pa Jan. 8, 2015).

Additionally, this action is not split between this Court and the Philadelphia Court of Common Pleas. Once Global Auto removed this action from state court, the state court relinquished its jurisdiction over the controversy. Therefore, CBSG’s assertion that this matter is split between courts is incorrect.

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We respectfully thank the Court for Your Honor's consideration of this matter.

Respectfully submitted,

WHITE AND WILLIAMS LLP

/s/ Luke McDaniels

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LEM:me

CC: Norman Valz
Shane Heskin